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Counsel for YYP Group, Ltd.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

IN RE:	§	CASE NO. 19-40007-mxm
CGE REAL ESTATE HOLDINGS, LLC	§	Chapter 11
DEBTOR.	§	
<hr/>		
YYP GROUP, LTD.	§	
Movant	§	
v.	§	<i>Hearing set for</i>
CGE REAL ESTATE HOLDINGS, LLC	§	<i>March 14, 2019; 1:30 p.m.</i>
Respondent.	§	

**WITNESS AND EXHIBIT LIST OF YYP GROUP, LTD.**

Creditor YYP GROUP, LTD. (“Movant”) hereby designates the following witnesses and exhibits for the scheduled hearing on **March 14, 2019 at 1:30 p.m.** before the Honorable Mark X. Mullin, U.S. Bankruptcy Judge. The following matter has been set for hearing:

- A. Motion for Relief from Automatic Stay as to Real Property Located at 3624 Shenandoah Street in Dallas, Texas 75205 filed by YYP Group, Ltd. [Docket No. 10] filed on January 23, 2019.

**WITNESSES**

<b>Witness</b>
1. George Kimeldorf or other representative of YYP Group, Ltd.
2. All witnesses necessary for rebuttal.

<b>Witness</b>
3. All witnesses presented by other parties not objected to by YYP Group, Ltd.
4. Debtor representative

**EXHIBITS**

<b>No.</b>	<b>Description</b>
1.	Real Estate Lien Note in the original principal sum of \$1,400,000.00 dated July 27, 2018, and executed by Debtor
2.	Deed of Trust dated July 27, 2018, and executed by Debtor
3.	Assignment of Rents and Leases dated July 27, 2018, and executed by Debtor
4.	Temporary Forbearance Agreement dated December 3, 2018, and executed by Debtor
5.	Deed of Trust and Assignment of Rents dated November 1, 2018, and executed by Debtor as Trustor and UCR Group, LLC as Beneficiary
6.	Schedules and Statement of Financial Affairs filed by Debtor
7.	All exhibits introduced by other parties not objected to by YYP Group, Ltd.
8.	All filings in this bankruptcy case
9.	All exhibits necessary for rebuttal

Additionally, Movant expressly reserves the right to amend and add additional witnesses and exhibits including witnesses or exhibits listed by any other party and/or rebuttal or impeachment witnesses and exhibits, as they are determined to be relevant or helpful by Movant or the Court. Movant reserves the right to use any documents filed in the bankruptcy case subsequent to the filing and serving of this witness and exhibit list, and to move the Court for additional relief, if necessary, including asking the Court to take judicial notice of any documents, pleadings, entries, or orders entered in the bankruptcy case. Movant objects to judicial notice of documents, affidavits, or other evidence filed with the Court that is not available for cross-examination purposes.

DATED March 11th, 2019.

Respectfully submitted,

**JONES, ALLEN & FUQUAY, L.L.P.**  
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Dallas, Texas 75243  
Telephone: (214) 343-7400  
Facsimile: (214) 343-7455

By: /s/ Laura L. Worsham  
Laura L. Worsham  
State Bar No. 22008050

Attorneys for YYP GROUP, LTD.

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the above Witness and Exhibit List has been served on the parties set forth below electronically and as otherwise set out, this 11<sup>th</sup> day of March, 2019:

U.S. Trustee  
1100 Commerce Street  
Room 976  
Dallas, TX 75242  
**By Notice of Electronic Filing**

Eric A. Liepins  
*Counsel for Debtor*  
12770 Coit Road, Suite 1100  
Dallas, TX 75251  
**By Notice of Electronic Filing**

CGE Real Estate Holdings, LLC  
*Debtor*  
8412 Desert Falls  
Fort Worth, TX 76137  
**First Class Mail**

Laurie A. Spindler  
*Counsel for Tarrant and Dallas Counties*  
Linebarger Goggan Blair & Sampson, LLP  
2777 N. Stemmons Frwy., Suite 1000  
Dallas, TX 75207  
**By Notice of Electronic Filing**

Eboney Cobb  
*Counsel for Town of Highland Park and  
Highland Park ISD*  
Perdue, Brandon, Fielder, Collins & Mott, LLP  
500 E. Border Street, Suite 640  
Arlington, TX 76010  
**By Notice of Electronic Filing**

/s/ Laura L. Worsham  
Laura L. Worsham